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Pro Se 2 (Rev. 12/16) Complaint and Request for Injunction

JAN 19 2022**UNITED STATES DISTRICT COURT**CLERK, U.S. DISTRICT COURT
ST. PAUL, MINNESOTA

for the

District of _____

Division _____

ELSIE MAYARD

Case No.

22-cv-143 NEB/TNL*(to be filled in by the Clerk's Office)**Plaintiff(s)**(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)***-v-****CITY OF ST. PAUL, PAULA SEELEY
THOM ZANGS AT ALL,***Defendant(s)**(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)***COMPLAINT AND REQUEST FOR INJUNCTION****I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	ELSIE MAYARD
Street Address	755 W, MINNEHAHA AVE
City and County	ST. PAUL
State and Zip Code	MN 55104
Telephone Number	218-260-5516
E-mail Address	

B. The Defendant(s)Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title *(if known)*. Attach additional pages if needed.

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.
under 28 U.S.C. 1332

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* Elsie Mayard, is a citizen of the
State of *(name)* MN.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated
under the laws of the State of *(name)* _____,
and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* Paula Seeley I, is a citizen of
the State of *(name)* Minnesota. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) City of SAINT PAUL Municipally, is incorporated under the laws of the State of (name) MN, and has its principal place of business in the State of (name) MINNESOTA.
 Or is incorporated under the laws of (foreign nation) _____,
 and has its principal place of business in (name) 15 W,KELLOGG BULVARD.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

\$75,000 plus court fee

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

defendant deprive the plaintiff, and her property rights November 8,2021 demanded plaintiff move out her home threat the plaintiff with the police and posted sign at the plaintiff private property on 12/13/2021 posted sign water shut off on 12/3/2021 plaintiff paying water to defendant \$204.78 later on defendant turn the plaintiff water off plaintiff with out a water in her home while defendant taking money from the plaintiff 1-18-2022 defendant threat the plaintiff to turn water off from her home each day and everyday threat been made by the defendant trying to force the plaintiff out of private property in St. Paul ,MN defendant retaliated, against the plaintiff wanted to cause badly harm to the plaintiff threat the plaintiff heath and safe

B. What date and approximate time did the events giving rise to your claim(s) occur?

October 15,2021 11-8-2021 1-18-2022 1-19-2022 7-17-2020

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Defendant No. 1

Name CITY OF ST. PAUL
 Job or Title (if known)
 Street Address ST. OF PAUL MARGEN
 15 W. KELLOG BLVD
 City and County RAMSEY
 State and Zip Code 55110 /
 Telephone Number
 E-mail Address (if known)

Defendant No. 2

Name Paula Seeley
 Job or Title (if known)
 Street Address 15 W. Kellogg Blvd
 City and County Ramsey
 State and Zip Code 55101
 Telephone Number
 E-mail Address (if known)

Defendant No. 3

Name THOM ZANGS
 Job or Title (if known) WORKER
 Street Address 15 W. Kellogg Blvd
 City and County ST. PAUL MN
 State and Zip Code 55101
 Telephone Number
 E-mail Address (if known)

Defendant No. 4

Name
 Job or Title (if known)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (if known)

- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)
- Paula Seeley City of ST. Paul, and Thom ZANGS ST. PAUL regional water at all, Paula Seeley come to my house telling me to let her get into my house, when asking question Paula Seeley said to me the plaintiff have no right and call police make false police report about the plaintiff, on October 15, 2021 plaintiff call the city of ST. Paul water regional about a noise sense they been replace meter in my property I been call them sense the ignore the plaintiff until 10-15-2021 I call again the came to my property telling the plaintiff it was a leak all the contractor the city of ST. Paul provide me to call the plaintiff call all and of them the charge me money told me I do not have leak Thom ZANGS demander the plaintiff water turn off while the plaintiff been making every effort to get people to look if the plaintiff property has a but the city of st. Paul deprive the plaintiff her constitution right by threat the plaintiff turn her water off without justification injustice, asking this court Injunction from city of ST. Paul and they employees stop threat me until further notice by this court if it is a leak it will fix only if the leak +

IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

been out of water at my House
Abuse me. not able to cleaning up

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

asking To this Court stop city of
st. Paul Abuse the power
punitive money damage

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

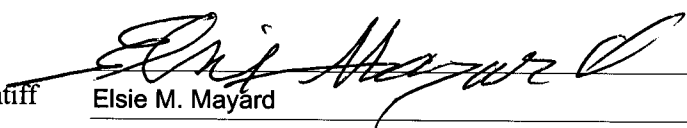
A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 01/19/2022

Signature of Plaintiff

Printed Name of Plaintiff


Elsie M. Mayard

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address